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PRMT-SECTION

Treatment & Recovery Services

March 30, 1994

Mark Matthews
U.S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI (HRIW)
EPA ID No. KSD007246846
RCRA Part B Permit Application - Replacement Pages

Dear Mr. Matthews,

Enclosed you will find a set of responses to your comments of September 28, 1993, together with revised pages for the HRIW RCRA permit application. We have organized the comment response package to repeat each of your comments, providing a rationale for our response and the revised text resulting from the comment, as appropriate. A set of revised pages with changes marked in redline/strikeout is provided.

If you have any questions regarding these matters, please contact Steve Keiter at (316) 268-7500.

Sincerely,

Stephen M Keiter

Stephen M. Keiter
General Manager
Hydrocarbon Recyclers, Inc. of Wichita

cc: B. Apple, HRI
L. Hetherington-Ward, USPCI

Hydrocarbon Recyclers, Inc. of Wichita
2549 North New York • Wichita, Kansas 67219 • 316/268-7500 • Fax 316/268-7555

RESPONSE TO SEPTEMBER 28, 1993 COMMENTS
RCRA PART B PERMIT APPLICATION
HYDROCARBON RECYCLERS, INC., OF WICHITA D/B/A/ USPCI

1. **In the response to comment 7.(c) of our comment letter dated July 1, 1992, HRI stated that three (3) standard deviations will be changed to two (2). The revised pages still reflect three (3) standard deviations.**

HRIW Commentary

The language on page 13-A of Section J (the Closure Plan) has been revised to indicate that two standard deviations will be used to define background concentrations for the closure performance standard.

HRIW New/Revised Narrative (Section J, Page 13)

... The facility "background" will be considered the mean plus two ~~three~~ standard deviations.

Visibly contaminated soil, either adjacent to or under containment systems of waste management units, will be removed. Excavated soil and debris will be analyzed according to standard laboratory procedures for the presence of hazardous constituents and managed in accordance with applicable regulations. Procedures for sampling and analysis of soil remaining after excavation (if applicable) are listed below.

1. For partial closure involving possible soil contamination, six representative background samples will be taken on-site but away from the visible contamination at depths of 0-18 inches and 18-36 inches at each of three sample points and analyzed using either USEPA SW-846 8260 and/or SW-846 8015, modified, or another equivalent, acceptable method. For all methods of record, deviations from SW-846 methods have either been included in the Waste Analysis Plan (Section C) for agency approval at this time, or will be submitted to the agency for approval prior to use. Background samples will be taken from the same soil type and at the same soil horizon as non-background samples. The facility "background" will be considered the mean plus two ~~three~~ standard deviations.

2. Section M has been revised to say that waste codes will be dropped after three (3) unit volumes have been processed through miscellaneous units. Section M should contain a table showing the unit volume for each miscellaneous unit.

HRIW Commentary

A table has been added to Section M specifying the volumes of each of the miscellaneous units at HRIW. The disperser is the equipment used to mix materials in the disperser tank, which is addressed as a hazardous waste storage tank under Section E of the RCRA permit application. During closure, the disperser will be closed simultaneous to the disperser tank closure. For that reason, the disperser volume is accounted for with the hazardous waste storage tank volumes, but not in the miscellaneous units volumes.

HRIW New/Revised Narrative (Section M, Page 1-B)

- Miscellaneous Units - The three unit volumes processed through the unit after completion of management of a listed or characteristic waste will be considered as carrying the same listed codes, or characteristic codes (unless tested and shown otherwise). Waste codes will be dropped from waste streams managed subsequent to these three unit volumes. The volumes of each miscellaneous unit are listed below:

Dryer	487 gallons
Shredder	103 gallons
Granulator	209 gallons
Drum Scraper	72 gallons
Drum Washer	1173 gallons
Disperser	0 gallons (accounted for with tank storage volumes).

- Tanks - After removal of a listed or characteristic waste, tanks will be cleaned by rinsing, scaping, brushing, or other physical method until deemed visually clean. Waste codes of previously managed wastes will not be carried on subsequent waste streams managed.

- Miscellaneous Units - The three unit volumes processed through the unit after completion of management of a listed or characteristic waste will be considered as carrying the same listed codes, or characteristic codes (unless tested and shown otherwise). Waste codes will be dropped from waste streams managed subsequent to these three unit volumes. The volumes of each miscellaneous unit are listed below:

Dryer	487 gallons
Shredder	103 gallons
Granulator	209 gallons
Drum Scraper	72 gallons
Drum Washer	1173 gallons
Disperser	0 gallons (accounted for with tank storage volumes).

- Piping - The one unit volume processed through piping after completion of management of a listed or characteristic waste will be cosidered as carrying the same listed codes, or characteristic codes (unless tested and shown otherwise). Waste codes will be dropped from waste streams managed subsequent to this one unit volume.

3. HRI needs to reverse the footnoted asterisked values for Sample No. HT071991002 on page 1 of Appendix M-C.

HRIW Commentary

The footnoted asterisked values for Sample No. HT071991002 on page 1 of Appendix M-C have been reversed.

HRIW New/Revised Narrative ()

... Methylene Chloride 500 ppm** ...

... Benzene 1 ppm* ...

USPCI, INC
HEALTH AND SAFETY
MONITORING RESULTS
HRS - WICHITA
JULY 19, 1991

SAMPLE NO.	JOB DESCRIPTION LOCATION	CONTAMINANT	EXPOSURE STANDARD	RESULT	COMMENTS
HT071991002	Operator/Helper	Perchloreothylene	25 ppm	1.02 ppm	Exposure occurred in operations and drum processing area; the results include exposure that occurred during tank gauging. Sample time as 318 minutes.
		Methylene Chloride	500 ppm **	0.4 ppm	
		Toluene	100 ppm	10.4 ppm	
		Xylene	100 ppm	1.5 ppm	
		Benzene	1 ppm *	0.06 ppm	
		Acetone	750 ppm	9.2 ppm	
		1,1,1 Trichloroethane	350 ppm	0.84 ppm	
			* TLV=0.1 ppm		
			** TLV=50 ppm		
HT071991004	Operator/Helper	Perchloroethylene	25 ppm	43.4 ppm	Operator worked primarily in the Granulator Area all day; normal operating conditions - granulator down for maintenance on a frequent basis. Sample time was 317 minutes.
	Granulator Area				
HT071991005	Operator/Helper	Perchloroethylene	25 ppm	11.1 ppm	Operator worked in Drum Processing area and conducted normal tasks for that area (i.e., moving and staging drums, pumping drums, dumping drums, etc.) Sample time was 308 minutes.
		Xylene	100 ppm	9.3 ppm	
	Drum Processing	Toluene	100 ppm	1.1 ppm	
		Benzene	1 ppm *	0.03 ppm	
		Methylene Chloride	500 ppm **	0.19 ppm	
			*TLV=0.1 ppm		
			**TLV=50 ppm		
HT071991006	Operator/Helper	Perchloroethylene	25 ppm	11.1 ppm	Exposure occurred while gauging tanks; 15 tanks gauged during sampling period. Total time for task and sampling time was 15 minutes.
		Methylene Chloride	500 ppm *	9.3 ppm	
	Tank Storage Area	Toluene	100 ppm	1.1 ppm	
		Xylene	100 ppm	<0.16 ppm	
		Benzene	1 ppm **	0.04 ppm	
		Acetone	750 ppm	0.86 ppm	
		1,1,1 Trichloroethane	350 ppm	10.2 ppm	
			*TLV=50 ppm		
			**TLV=0.1 ppm		
HT071991008	Operator/Helper	Perchloroethylene	25 ppm	68.2 ppm	Exposure occurred while dumping drums of granulated material into augur leading to the Dryer. Sample time was 15 minutes.
	Granulator Area				
HT071991009	Operator/Helper	Perchloroethylene	25 ppm	29.7 ppm	Operator was monitored while he was loading canisters into the granulator feed hopper. Sample time was 15 minutes.
	Granulator Area				